

JAN - 9 2015

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS CLERK, U.S. DISTRICT COURT
FORT WORTH DIVISION

By _____
Deputy

UNITED STATES OF AMERICA

v.

ERICA AYALA (01)
JESSICA ANN ROSEMERG (02)

No. 4:15-MJ- 005

CRIMINAL COMPLAINT

Conspiracy to Possess a Controlled Substance with Intent to Distribute

Beginning sometime in 2014, and continuing until on or about January 8, 2015, in the Fort Worth Division of the Northern District of Texas, and elsewhere, defendants **Erica Ayala** and **Jessica Ann Rosemerry** along with others known and unknown, did knowingly and intentionally combine, conspire, confederate, and agree to engage in conduct in violation of 21 U.S.C. §§ 841(a)(1) & (b)(1)(B), namely to possess with intent to distribute 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a schedule II controlled substance, in violation of 21 U.S.C. § 846.

I, the undersigned Complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

1. On December 9, 2014, Agents and Officers with the Drug Enforcement Administration (DEA) Fort Worth Resident Office and the North Richland Hills Police Department arrested Erica Ayala. At that time, she was in possession of approximately one pound of methamphetamine. During a post Miranda interview, Erica Ayala advised Agents and Officers that she routinely picked up and distributed multi-ounce quantities of methamphetamine.

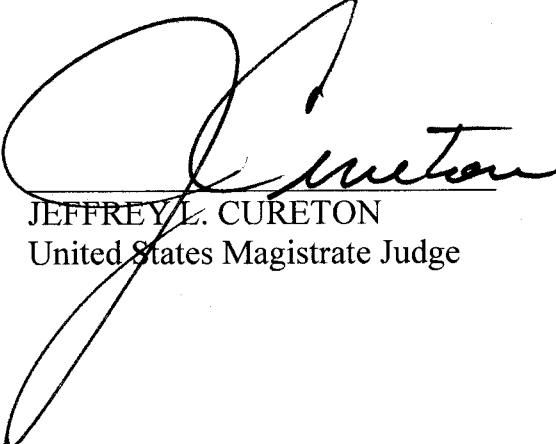
2. On January 8, 2015, Officers with the North Richland Hills Police Department arrested Erica Ayala and Jessica Ann Rosemerry for being in possession of a Remington 870 shotgun, approximately ½ ounce of methamphetamine, and drug paraphernalia. During a post Miranda interview, Erica Ayala advised Agents and Officers that Jessica Ann Rosemerry had only been out of state-jail for approximately two weeks, but prior to her going to state jail earlier in 2014, on at least ten (10) occasions, Jessica Ann Rosemerry had supplied Erica Ayala with multi-ounce quantities of methamphetamine. Erica Ayala also said that the ½ ounce of methamphetamine found on January 8, 2015, had been supplied to her by Jessica Rosemerry, and that Erica Ayala had recently sold another ½ ounce of methamphetamine that had been supplied by Jessica Rosemerry.

3. Although I have not listed all the facts regarding this conspiracy, I believe that the facts stated here establish probable cause that the defendants have committed a violation of 21 U.S.C. § 846, Conspiracy to Possess Methamphetamine with the Intent to Distribute it.



Brian Finney
Special Agent
Drug Enforcement Administration

SWORN AND SUBSCRIBED before me, at 3:05 am/pm, this 9th day of January, 2015, in Fort Worth, Texas.



JEFFREY L. CURETON
United States Magistrate Judge